

ANN MILLER RAVEL, County Counsel (S.B. #62139)
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Attorneys for Defendants
COUNTY OF SANTA CLARA
AND EDWARD FLORES

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

E-FILED - 8/30/06

MAI THI VU,) No. C05-2605 RMW
Plaintiff,)
v.)
GILLMORE CLARK, LAURIE SMITH,) STIPULATION AND [PROPOSED] ORDER
SHERIFF FOR SANTA CLARA) VACATING TRIAL DATE AND
COUNTY, SANTA CLARA COUNTY,) SCHEDULING FURTHER CASE
AND DOES 1-50) MANAGEMENT CONFERENCE
Defendants.) [FED. CIVIL L.R. 6-1(b), 6-2, AND/OR 7-11]

The parties, by and through their respective counsel of record, hereby stipulate and agree to a court order vacating the trial date of October 23, 2006, and all related pre-trial due dates, and scheduling a further Case Management Conference to be held in October 2006, at which time the court will schedule a later trial date. The reason(s) for this stipulation and request for court order is set forth with particularity in the accompanying Affidavit of Gregory J. Sebastinelli in Support of this Stipulation and [Proposed] Order. This stipulated request is being made well in advance of any scheduled court hearing, proceeding, or pre-trial deadline, and will not prejudice any party. In fact, the granting of this stipulated request will allow all

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1 parties to resolve outstanding discovery issues and complete discovery in time to meaningfully
2 participate in alternative dispute resolution and, if necessary, trial.

3 IT IS SO STIPULATED.

4 LAW OFFICES OF MATTHEW KUMIN

5 By:

6 
MATTHEW KUMIN, ESQ.

7 Attorney for Plaintiff
8 MAI THI VU

9 PIER 5 LAW OFFICES

10 Dated: July 27, 2006

11 By:

12 RANDOLPH DAAR, ESQ.

13 Attorney for Plaintiff
14 MAI THI VU

15 ROBINSON & WOOD, INC.

16 Dated: July , 2006

17 By:

18 JESSE F. RUIZ, ESQ.

19 Attorney for Defendant
20 LEONARD CLARK erroneously sued
herein as GILLMORE CLARK

21 ANN MILLER RAVEL
22 County Counsel

23 Dated: July , 2006

24 By:

25 GREGORY J. SEBASTINELLI
Lead Deputy County Counsel

26 Attorney for Defendants
27 COUNTY OF SANTA CLARA and
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6 Dated: July ___, 2006

7 By: MATTHEW KUMIN, ESQ.

8 Attorney for Plaintiff
MAI THI VU

9 PIER'S LAW OFFICES

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11 Dated: July 27, 2006 By: RANDOLPH DAAR, ESQ.

12 Attorney for Plaintiff
MAI THI VU

13 ROBINSON & WOOD, INC.

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23 Attorney for Defendants
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LAW OFFICES OF MATTHEW KUMIN

Dated: July , 2006

By: MATTHEW KUMIN, ESQ.

Attorney for Plaintiff
MAI THI VU

PIER 5 LAW OFFICES

Dated: July , 2006

By: RANDOLPH DAAR, ESQ.

Attorney for Plaintiff
MAI THI VU

ROBINSON & WOOD, INC.

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Attorney for Plaintiff
MAI THI VU

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16 Attorney for Plaintiff
17 MAI THI VU
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25 Attorney for Defendant
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ANN MILLER RAVEL
County Counsel

Dated: July 28, 2006
By: _____
GREGORY J. SEBASTINELLI
Lead Deputy County Counsel

Attorney for Defendants
COUNTY OF SANTA CLARA and
EDWARD FLORES

1 PURSUANT TO STIPULATION, IT IS SO ORDERED that the October 23, 2006 trial
2 date, and all related pre-trial due dates, are vacated and that a further Case Management
3 Conference is scheduled for October 20, 2006, at 10:30a.m. in Courtroom No. 6.
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5 Dated: 8/30/06

/S/ RONALD M. WHYTE
HONORABLE RONALD M. WHYTE
Judge of the United States District Court

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